

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JUAN JOHNSON,	)	
	)	
Plaintiff,	)	05 C 1042
	)	
v.	)	Judge Grady
	)	
REYNALDO GUEVARA, and the	)	
CITY OF CHICAGO,	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION IN LIMINE NO. 7  
TO BAR DEFENDANTS FROM ARGUING THAT GANG MEMBERS  
COERCE/PROCURE WITNESS RECANTATIONS**

NOW COMES Plaintiff, JUAN JOHNSON, by his counsel, and respectfully brings the following motion *in limine*.

**Discussion**

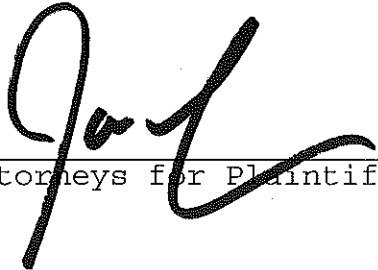
Defendants have moved to bar Plaintiffs from arguing that "police officers" as a group do bad things, such as coerce witnesses or manipulate testimony. Defendants have thus moved to bar other, unrelated examples of police misconduct.

The same reasoning applies both ways.

Specifically, Defendants cannot be permitted to argue that "gang members" as a group do bad things, such as coerce witnesses or manipulate testimony. Just as they have asked Plaintiff to be prohibited from doing with respect to Chicago Police Officers, Defendants must be barred from appealing to prejudicial stereotypes such as that gang members pressure witnesses to recant.

WHEREFORE, Defendants should be barred from making generalized arguments or suggestions that gang members force witnesses to recant testimony.

RESPECTFULLY SUBMITTED,

  
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